



THE CITY OF NEW YORK  
**LAW DEPARTMENT**

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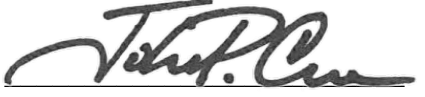
July 1, 2021

**BY ECF**

Honorable John P. Cronan  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Defendants' request is granted. Fact discovery shall be completed by September 10, 2021, and expert discovery shall be completed by November 8, 2021.

SO ORDERED.  
Date: July 2, 2021  
New York, New York

  
JOHN P. CRONAN  
United States District Judge

Re: Yajaira Saavedra v. City of New York, et al., 19-cv-7491(JPC)

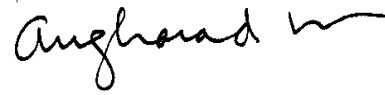
Your Honor:

I am a Senior Counsel in the office of Georgia M. Pestana, Acting Corporation Counsel of the City of New York, and am the attorney assigned to the defense of this matter. I write to respectfully request a 60-day extension of the fact discovery deadline, from July 12, 2021 to September 10, 2021. This extension is being requested because this case is being transferred to another attorney in this Office, in part because the undersigned is scheduled to begin a medical leave on July 2, 2021. Further, due to related medical issues of the undersigned and a number of unanticipated difficulties in answering for the newly named defendants, there remain a number of items of discovery that need to be resolved. As such, the newly assigned Assistant Corporation Counsel will need additional time to familiarize themselves with the case and complete the outstanding discovery, including, but not limited to, defending the depositions of the officers newly named in the Third Amended Complaint, Sergeant Paul O'Connor and former Captain Steven Dixon, as well as the depositions of the undercover officers who were involved in this matter. Plaintiff's counsel consents to the requested extension. This is the fourth request for an extension of this deadline; the prior joint requests for extension were granted.

For the foregoing reasons, defendants request a 60-day extension of the fact discovery deadline from July 12, 2021 to September 10, 2021, with a corresponding extension of the expert discovery deadline from September 7, 2021 to November 8, 2021.

Thank you for your consideration of the foregoing.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Angharad" followed by a stylized flourish.

Angharad Wilson  
Senior Counsel

cc: All Counsel (via ECF)